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To: BehavioralMarketingPrinciples
Cc:
Subject: Proposal for Inclusion in Standards

This submission is in response to the invitation for comments provided at the site at the following link:

<http://www.ftc.gov/opa/2007/12/principles.shtm>

The standards should include the following.

1. While advertising supports free Web content, the user accessing various sites should be able to prohibit collection of personal information, including information on the identification of the computer address. If the provider of certain web content wants to make access conditional on accepting collection of information, that is the privilege of the provider of the information.
2. Many computers are used by multiple users. The arrival of targeted ads could convey information that a user considers private, and that the user does not want exposed to subsequent users of the computer. Therefore, it should be a requirement that no information should be retained, and no targeted ads should be sent, beyond the time that the browser window is open.
3. There are many cases where the web is used for business and other purposes, such as for streaming stock quotes from one's broker or quote service, or accessing a government web site, or on the site of another commercial enterprise. Collectors of data, and others, should not be permitted to send ads that would disrupt use of sites other than the site from which the data was collected.
4. OPT-IN and OPT-OUT provisions are often obscure or with "checked blocks" that cause an OPT-IN response to be recorded in the event of an inadvertent click or <ENTER> strike. The OPT-IN provisions should always require a conscious action by the user, and should be displayed with font-size, location, and prominence equal to the largest of any other symbols or text that the user is expected to read.
5. Because many users may use the same computer, all OPT-IN acceptances should expire when the user leaves the site and all collected data should be deleted.

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